US ERA ARCHIVE DOCUMENT

Date:28/Dec./2001

SUBJECT: EP [X] MP [] PRODUCT CHEMISTRY REVIEW -- ACTION: 160

DP BARCODE No.D279113 EPA Reg.No. 42750-AT

PRODUCT NAME: GLY STAR CONCENTRATE

COMPANY: ALBAUGH INC.

TO: PM 25: Jim Tompkins/Juanita Gilchrist, PM Team Reviewer

Branch: Herbicide

Registration Division (7505C)

FROM: Harold Podall, Ph.D., Chemist 14. Podall

Technical Review Branch/RD(7505C)

INTRODUCTION DESCRIPTION OF SUBMISSION:

The Registrant requests registration of the basic and two alternate formulations for the subject product GLY STAR CONCENTRATE (all dated 10/8/01). The product is claimed to be a "me-too" of Monsanto's Roundup Weed & Grass Killer Concentrate, EPA Reg.No. 71995-26. The product Label, EPA receipt date 10/11/01, and MRIDs 455237-01 (Product Identity & Composition, Description of the Starting Materials and Formulation Process, Discussion of the Formation of the Impurities, Certified Limits and of the Analytical Method to verify the CLs) and 455237-02 (Physical & Chemical Characteristics were submitted in support of the registration.

SUMMARY OF FINDINGS:

- 1. In comparing the CSF for the basic formulation with that for Monsanto's Roundup registered product EPA Reg.No.71995-26 , it is apparent that there is a significant difference in the compositions of the two products.
- 2. There is a significant difference between the basic and alternate formulations for the subject product, Gly Star Concentrate.
- 3. There is only one set of physical chemical properties reported for the basic and alternate formulations in spite of the significant difference in composition between the basic and alternate formulations.
- 4. It would appear that from an environmental protection standpoint that it would be desirable to employ the purest grade of the Glyphosate technical for the production of the three formulations in

CONCLUSIONS/RECOMMENDATIONS:

Based on the second finding, the basic and alternate formulations need to be treated as separate products. In addition, the physical and chemical properties for the products in question need to be provided.